

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: CHARLES E. SCHUCHMAN : CHAPTER 13  
Debtor(s) :  
 :  
 :  
 CHARLES J. DEHART, III :  
 STANDING CHAPTER 13 TRUSTEE :  
 :  
 :  
 Movant :  
 vs. :  
 :  
 :  
 CHARLES E. SCHUCHMAN :  
 Respondent(s) : CASE NO. 1-17-bk-01951

TRUSTEE'S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

AND NOW, this 8th of December, 2017, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
- a. The plan is underfunded relative to claims to be paid. (Trustee commission)
  - b. Debtor has made no plan payments to date.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/James K. Jones  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 8th day of December, 2017, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Michael Csonka, Esquire  
166 South Main Street  
Kerrstown Square  
Chambersburg, PA 17201

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee